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October 16, 2002

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Supplement to License Amendment Request 02-00278
Revision to Technical Specifications Regarding DC Electrical Power Sources Based on TSTF-360

Reference:
1. Letter from M. P. Gallagher to USNRC, dated May 31, 2002
2. Technical Specifications Task Force (TSTF) Traveler-360, "DC Electrical Rewrite," Revision 1

This letter is being sent to supplement the License Amendment Request (LAR) to modify Technical Specification (TS) requirements for direct current (DC) sources through revision of Specifications 3.8.2.1 and 3.8.2.2, and addition of new Specification 6.8.4.h (Reference 1). LAR 02-00278 proposes TS requirements that are consistent, except for format, with the requirements of Specifications 3.8.4, 3.8.5, 3.8.6, and 5.5.14 described in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, which are based on the NRC approved industry Technical Specification Task Force (TSTF) change TSTF-360, Revision 1 (Reference 2).

In response to a comment from the NRC technical reviewer, the following change to LAR 02-00278 (Reference 1) is proposed. TS Bases page B 3/4 8-2b states that,

> "Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating."

However, LAR 02-00278 also provides a commitment to IEEE Standard 450, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," with the exception of specific gravity monitoring frequency. IEEE-450-1995 contains a different definition for battery degradation,

> "Degradation is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating."

A001

Exelon committed to IEEE 450-1995 with the exception of specific gravity monitoring. As a result, TS Bases page B 3/4 8-2b for LGS Units 1 & 2 has been revised to reflect the IEEE 450-1995 definition of battery degradation and is re-submitted via this letter.

There is no impact to the No Significant Hazards Consideration submitted in the Reference 1 letter.

There are no additional commitments contained within this letter.

If you have any questions or require additional information, please contact me at (610) 765-5664.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 10-16-02

Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachments: Attachment 1 - Marked-Up Technical Specification Bases Pages
Attachment 2 - Camera-Ready Technical Specification Bases Pages

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
S. Wall, Project Manager, USNRC
R. R. Janati - Commonwealth of Pennsylvania

ATTACHMENT 1
MARKED-UP TECHNICAL SPECIFICATIONS BASES PAGES

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85

SUPPLEMENT TO LICENSE AMENDMENT REQUEST 02-00278

"Revision to Technical Specifications Regarding DC Electrical Power Sources Based on TSTF-360"

REVISED TS BASES PAGES

UNIT 1	UNIT 2
3/4 8-2b	3/4 8-2b

INSERT A

Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating.

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

A battery performance discharge test (4.8.2.1.e and f) is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage. Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying 4.8.2.1.e and 4.8.2.1.f; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of 4.8.2.1.d.2.

REPLACE WITH INSERT A

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

A battery performance discharge test (4.8.2.1.e and f) is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage. Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying 4.8.2.1.e and 4.8.2.1.f; however, only the modified performance discharge test may be used to satisfy the battery service test requirements of 4.8.2.1.d.2.

REPLACE WITH INSERT A

ATTACHMENT 2
CAMERA-READY TECHNICAL SPECIFICATION BASES PAGES

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85

SUPPLEMENT TO LICENSE AMENDMENT REQUEST 02-00278

"Revision to Technical Specifications Regarding DC Electrical Power Sources Based on TSTF-360"

REVISED TS BASES PAGES

UNIT 1	UNIT 2
3/4 8-2b	3/4 8-2b

A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

A battery performance discharge test (4.8.2.1.e and f) is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage. Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating.

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A.C. SOURCES, D.C. SOURCES, and ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

A battery performance discharge test (4.8.2.1.e and f) is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage. Degradation (as used in 4.8.2.1.f) is indicated when the battery capacity drops more than 10% from its capacity on the previous performance test, or is below 90% of the manufacturer's rating.

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